HEMMINGS & SNELL LLP 30 Wall Street, 8th Floor New York, NY 10005 Tel. (212) 747-9560 Fax (212) 747-9564 general@hemmingssnell.com Attorneys for the Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MARIATERESA NOBLE.

ANSWER

Plaintiff,

Civil Case No.: 18-cv-07871

-VS.-

MOUNT OLIVET CHURCH, INC., aka MOUNT OLIVERT CHURCH, INC., aka MOUNT OLIVER CHURCH, INC., aka MOUNT OLIVE CHURCH, INC., aka ARACELIS STAATZ, as Trustee of Mount Olivet Church,

Defendants.

Mount Olivet Church, Inc., and Aracelis Staatz, as Trustee of Mount Olivet Church ("Defendants"), by and through Francis E. Hemmings, Esq., hereby interpose the following answer and states upon belief and information, as follows:

- Admit in part and deny in part as to the allegations stated in Paragraph ONE of the complaint.
- 2. The Defendants have no knowledge of the allegations stated in Paragraph TWO of the complaint.
- 3-4. The Defendants admit to the allegations stated in Paragraph THREE and Paragraph FOUR of the complaint.
- 5-6 The Defendants have no knowledge of the allegations stated in Paragraph FIVE and Paragraph SIX of the complaint.

- 7. The Defendants deny the allegations stated in Paragraph SEVEN of the complaint.
- 8-9. The Defendants have no knowledge of the allegations stated in Paragraph EIGHT and Paragraph NINE of the complaint.
- 10-16. The Defendant have no knowledge of the allegations stated in Paragraphs TEN, ELEVEN, TWELVE, THIRTEEN, FOURTEEN, FIFTEEN, and SIXTEEN of the complaint.
- 17-22. The Defendants have no knowledge of the allegations stated in Paragraphs SEVENTEEN, EIGHTEEN, NINETEEN, TWENTY, TWENTY ONE, and TWENTY TWO of the complaint.
- 23. The Defendants deny the allegations stated in Paragraph TWENTY THREE of the complaint.
- 24. The Defendants deny the allegations stated in Paragraph TWENTY FOUR of the complaint.
- 25-28. The Defendants have no knowledge of the allegations stated in Paragraphs TWENTY FIVE, TWENTY SIX, TWENTY SEVEN, and TWENTY EIGHT of the complaint.
- 29. The Defendants have no knowledge of the allegations stated in paragraph TWENTY NINE of the complaint.
 - 30. The Defendants deny the allegation stated in paragraph THIRTY of the complaint.
- 31-34. The Defendant deny the allegations stated in paragraphs THIRTY ONE through THIRTY FOUR of the complaint.
- 35-36. The Defendants have no knowledge of the allegations stated in paragraph THIRTY FIVE and paragraph THIRTY SIX of the complaint.
- 37-38. The Defendants deny the allegations stated in paragraph THIRTY SEVEN and THIRTY EIGHT of the complaint.

39. The Defendants deny the allegations stated in paragraph THIRTY NINE of the complaint.

40. The Defendants deny the allegations stated in paragraph FORTY of the complaint.

Dated: October 3, 2018

New York, New York

Francis E. Hemmings Hemmings & Snell LLP 30 Wall Street, 8th Floor New York, NY 10005 Tel. (212) 747-9560 Fax (212) 747-9564

Fax (212) 747-9564 Attorney for Defendants

VERIFICATION

ARACELIS STAATZ, being duly sworn, depose and state:

I am the defendant herein, I have read the foregoing Answer and know of the contents thereof, the same is true to my own knowledge except as to those matters which are alleged on information and belief, and as to those matters, I believe them to be true.

Date: October 3, 2018

Sworn to before on this

31 day of October 2018

ARACELIS STAAT

NOTARY PUBLIC